2024 May-30 PM 12:31 U.S. DISTRICT COURT

N.D. OF ALABAMA

EXHIBIT 19

SWORN STATEMENT OF YVETTE TALSMA

- My name is Yvette Talsma. I am over the age of 21 and have personal knowledge of the contents of this statement.
- 2. I began working at CRC in 1990 in the mail room. I have worked on a production team since about 1992 or 1993. I have worked in all three departments in CRC's Birmingham office in the positions of technical assistant, broker assistant, and account executive. I worked as an account executive on Betsy Barnett's team for several years and worked with Corey Daugherty when he was on Barnett's team.
- 3. When Daugherty started his own team, I went with him. Daugherty and I had started working more closely together shortly before he started his own team. I had started helping him with his book of business.
- 4. I helped train Clay Segrest with processing accounts when he joined Team Daugherty. When Segrest first started, he was doing everything. He worked accounts start to finish and was also working on building client relationships. As the book grew and Segrest was traveling more, Andrea Sutton joined the team. I worked on Daugherty's accounts and would sometimes assist Segrest when he was traveling. Segrest did his own processing.
- 5. As a broker, Segrest has to be more aware of coverages and able to compare policies and is also obligated to bring in new business which are not part of my job responsibilities.
- 6. Sometime early on in my career I was asked if I wanted to be a broker but said I wasn't interested. I don't feel my personality is the right fit. I enjoy my work as an account executive and want to continue in that role.
- 7. Every now and then I will travel with Daugherty to visit agents I have developed relationships with. I have worked on agents with Daugherty for nearly 20 years and seen his business grow since he started his team. I know I could travel more if I wanted to. I don't think I would need assistance on my accounts in order to travel. There are company laptops and phones now so you can work while traveling if needed.
- 8. Kathryn Hendrix often complained to me. When she was first hired, the agencies were redistributed with Hendrix getting the newer agents. She complained she felt like she was getting the scraps, but Daugherty assigned agents based on who had a developed relationship with the agent. Relationships are important in our business. Over the years, she would complain to me her workload was too little or too much. She never seemed satisfied. I never heard her raise her complaints to Daugherty. I heard her complain to me and the other account executives.
- When Lauren Lindberg was given an office, Hendrix got really upset and complained it was unfair.
- 10. I was aware Daugherty encouraged Hendrix to travel and expand business with the team's existing agents.
- 11. I would have assisted Hendrix if she wanted to travel. I would have helped her if she asked. I don't ever remember Hendrix having too much work on the team.
- 12. After she became an inside broker, Hendrix commented to me that I should not be marketing accounts as an account executive, but she should be doing that. Hendrix expressed account executives should just be doing the processing work. I felt like Hendrix wanted to dumb down my position and thought her position was above mine.
- 13. The last time I spoke with Hendrix before she resigned, we were at a CRC event, and she was complaining about work assignments. She told me she wanted everyone to have clear, defined duties. I told Hendrix if she was unhappy, she should probably find something else because that just wasn't how to team or department operated.
- 14. After Hendrix left, her accounts were divided among the account executives. The accounts I had before Hendrix joined the team came back to me. I didn't notice any difference in my workload.
- 15. Although I have been at CRC and on a broker team longer than both Daugherty and Segrest, I expect they are paid more because they are the brokers on the team with additional responsibilities including producing the team's revenue.

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YVETTE TALSMA

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